

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRIDGET LENARD,)	
)	
Plaintiff,)	
)	
v.)	No. 08 CV 2173
)	
MULTI-AD SERVICES, INC.,)	
)	Judge Amy J. St. Eve
)	
Defendant.)	
)	

INITIAL STATUS REPORT

1. The Nature of the Case

A. Attorneys of Record:

For Plaintiff: Brian R. Holman
Dennis H. Stefanowicz, Jr.
Tara Beth Davis
Holman & Stefanowicz, LLC
30 South Wacker Drive, Suite 2425
Chicago, Illinois 60606
(312) 258-9700

For Defendant: Paul Burmeister
Kimberly Sarff
Husch, Blackwell Sanders, LLC
401 Main Street, Suite 1400
Peoria, Illinois 61602
(309) 637-4900

B. Basis for jurisdiction: The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331.

C. Nature of the claim: This action seeks redress for adverse employment decisions and/or actions by the Defendant “because of” or “on the basis of” the Plaintiff’s sex, particularly her pregnancy, in violation of the Plaintiff’s rights of equal protection under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000 *et seq.*

D. Major legal and factual issues in the case:

Did the Defendant terminate the Plaintiff's employment because of her sex, particularly her pregnancy, in violation of the Plaintiff's rights of equal protection under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000 *et seq.*

Did the Defendant terminate the Plaintiff for a reason unrelated to her pregnancy.

E. Relief sought by Plaintiff:

- a. All wages and benefits the Plaintiff would have received but for the discrimination, including pre-judgment interest;
- b. Compensatory damages in an amount to be determined at trial to compensatory the Plaintiff for depression, humiliation, anguish, emotional distress, and defamation, cause by Defendant's conduct;
- c. That Defendant Multi-Ad be required to pay prejudgment interest to the Plaintiff on these damages;
- d. Award the Plaintiff punitive damages;
- e. A permanent injunction enjoining Defendant Multi-Ad from engaging in the discriminatory practices complained of herein;
- f. A permanent injunction requiring Defendant Multi-Ad to adopt employment practices and policies in accord and conformity with the requirements of Title VII, 42 U.S.C. § 2000e *et seq.*; and
- g. An award of reasonable attorneys' fees, costs and litigation expenses.

2. Pending Motions and Case Plan

A. Pending motions: None.

B. Proposed Discovery Plan:

- A. Type of discovery needed:** Written and oral discovery.
- B. Rule 26(a)(1) disclosures due by:** 7-18-08
- C. Fact discovery completed by:** 12-19-08
- D. Plaintiff's expert reports due by:** 1-23-09

Defendant's expert reports due by: 2-27-09

Expert discovery done by: 3-27-09

E. Dispositive motions due: 4-24-09

F. Final pretrial order due: To be determined.

C. Trial:

A. Jury trial is requested.

B. Probable length of the trial: 5 days

C. Case will be ready for trial by: To be determined.

3. Consent to Proceed Before a Magistrate Judge: Parties do not agree.

4. Status of Settlement Discussions:

A. No settlement discussions have occurred.

B. No status of settlement discussions.

C. Parties do not request a settlement conference at this time.

Respectfully submitted:

For Plaintiff:

For Defendant:

s/ Brian R. Holman

s/ Paul Burmeister

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